

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

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DISABILITY RIGHTS PENNSYLVANIA, :  
: Plaintiff,  
v. : Civil Action No. 1:19-cv-00062-SPB  
: Erie County, Pennsylvania, :  
: Defendant.  
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**PLAINTIFF'S MOTION FOR AN AWARD OF  
ATTORNEYS' FEES AND COSTS**

Pursuant to Federal Rule of Civil Procedure 54 and 42 U.S.C.A. § 1988 and the Court's Order dated May 29, 2019, Plaintiff, through its counsel, submit this Motion for an Award of Attorneys' Fees and Costs.

Plaintiff have secured a judicially-approved Consent Decree to resolve its claims under [42 U.S.C. §1983](#), the Protection and Advocacy for Individuals with Mental Illness Act (PAMI Act), [42 U.S.C. §§ 10801-10827](#), and the Developmental Disabilities Assistance and Bill of Rights Act (DD Act), [42 U.S.C. §§ 15041-15045](#). As such, it is the prevailing party and should be awarded reasonable attorneys' fees and costs. The amount Plaintiff request, \$19,085, reflects the reasonable lodestar of its attorneys and the compensable costs incurred in the successful litigation of this matter.

In support of this Motion, Plaintiff submit the accompanying Memorandum of Law and Exhibits, which are incorporated by reference as if fully set forth herein.

Respectfully submitted,

Dated: June 26, 2019                  By: /s/ Andrew Favini  
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